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April 18, 2022

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Doe v. Warren & Baram Mgmt. LLC, No. 1:20-cv-09522-ER/DCF

Dear Judge Ramos:

We write in response to former defendant Jonathan Baram's ("Baram") April 12, 2022 letter (ECF No. 123) and in accordance with this Court's memo endorsement on said letter. Baram's request to seal the record, which has been made *in seriatim*, should be denied.

First, the lone defendant (Warren & Baram Management LLC) can only be represented through counsel. Baram's latest submission is not made by an attorney and, therefore, it should be disregarded.

Second, there is a public interest in allowing society to scrutinize government functions, including open access to attend and observe both criminal and civil proceedings and filings. *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 599-600 (1980). The Court's files are open to the public and Baram cites no authority or legal argument to justify sealing the record or denying the public access to the court.

Baram's request to seal the record and/or redact certain allegations is improper, without authority, and contrary to the facts and the law. Plaintiff respectfully requests that the Court deny Baram's request.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'F. Franklin Amanat', with a stylized flourish at the end.

F. Franklin Amanat

cc: Magistrate Judge Freeman
Jonathan Baram